

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

THE STATE OF WASHINGTON,
Plaintiff,
vs.
THE GEO GROUP, INC.,
Defendant.

No. 3:17-cv-05806-RJB

30(B)(6) DEPOSITION UPON ORAL EXAMINATION
OF GEO GROUP, INC.
IN THE PERSON OF
RYAN KIMBLE

9:50 a.m.
July 9, 2018

1250 Pacific Avenue 105
Tacoma, Washington 98401-2317



REPORTED BY: JACQUELINE L. BELLOWS, CCR 2297



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1 Tacoma, Washington; July 9, 2018

2 9:50 a.m.

3 --oOo--

4
5 RYAN KIMBLE,
6 sworn as a witness by the certified court reporter,
7 testified as follows:

8

9 E X A M I N A T I O N

10 BY MS. BAKER:

11 Q. Good morning, Mr. Kimble.

12 A. Good morning.

13 Q. As you know, my name is LaRond Baker and I'm
14 an attorney for the State of Washington in this matter.
15 Our other counsel who's at the table is Andrea Brenneke.
16 And we are here with Cassidy, who is our intern.

17 Would you please state your full name for the
18 record.

19 A. Ryan Edward Kimble.

20 Q. How do you spell your last name?

21 A. K-I-M-B-L-E.

22 Q. And your employer?

23 A. The Geo Group.

24 Q. And what is your position for the Geo Group?

25 A. I'm the associate warden for finance and



1 it's -- I think the number on it is like a G -- it's a
2 government form. It's a G something, G like 412 or
3 something to that effect.

4 Q. And you indicated that the backup paperwork
5 that includes detainee-specific information has
6 detainee -- the detainee-workers' names?

7 A. And their A number.

8 Q. Does it also have the number of days they
9 worked per month?

10 A. No. It is by day. So every time that they
11 have signed that paper, their name appears on the list.
12 That's why, if there's 31 days in the month, however
13 many workers throughout that day will be a list of the
14 first, the second, the third, the fourth, the fifth, all
15 the way through.

16 Q. Does it also include locations where a
17 detainee has worked?

18 A. Yes.

19 Q. Is there any -- how are these documents
20 maintained? Is there a program that Geo utilizes to
21 maintain this information?

22 MS. MELL: Object to the form of the question.

23 A. There is the detainee trust fund, which is
24 purely the detainee's money. And that trust fund is
25 pooled into one account. And the facility uses the



1 Keefe Banking System to electronically divvy out, so you
2 know exactly to the penny per day, whose money is whose
3 because we'll get -- when detainees come in, they come
4 off the street with money. Or they have family members
5 that put money on their account. That money is put in
6 there. That is the banking system that's used to
7 delineate account balances.

8 Q (By Ms. Baker) So you call it the "Keefe
9 Banking System"?

10 A. K-E-E-F-E, Keefe Banking System is what the
11 facility uses.

12 Q. If you needed to run a report through the
13 Keefe Banking System to identify the number of
14 individuals who participate in the Voluntary Work
15 Program in a particular month, can you do that?

16 A. There's no way to do that. The only way to do
17 it is in the backup that was sent to COR because it's an
18 electronic entry each day from the previous day, saying
19 that they were there. So there's an electronic entry
20 that goes in the form. But there's no way you can
21 run -- I mean you could run it per person. You could
22 show any entries that have happened on a particular day
23 that person.

24 Q. Are you able to run reports and get aggregate
25 numbers through this system, through the Keefe Banking



1 trying to understand the format of this Keefe Banking
2 System that you described earlier, because we haven't
3 seen any documents that come from that system. So I'm
4 trying to understand.

5 Would this be -- is this a similar looking
6 report to what would be generated in support of your
7 monthly bills to ICE regarding the Voluntary Work
8 Program?

9 A. No.

10 Q. Do you have any idea what this report is?

11 MS. MELL: Don't guess. If you have never
12 seen it before, don't guess.

13 A. Yeah. I can only guess what this is.

14 Q (By Ms. Baker) Are there reports that you
15 generate, that the NWDC generates, that are similar to
16 this?

17 A. No.

18 Q. Thank you. So you had mentioned Excel
19 spreadsheets that were submitted in support of the
20 bills.

21 A. Uh-huh.

22 Q. Where do those Excel sheets come from? And
23 how are they maintained?

24 A. They -- I have to step back and think about
25 this. Hold on one second. I've got to think of the



1 flow of it because this is how it's presented to me.
2 Okay. So I guess I have to restate that. I
3 guess technically this would be part of the Keefe
4 Banking System 'cause I think that's where it's put in
5 because every day, like I said, we get the worker
6 sheets -- not the worker sheets -- the sheets where
7 they've signed that they participated. And then we get
8 those. Then the next day, we have a person that
9 manually puts in each one of them to the system to show
10 that they were part of that opportunity and to manually
11 put in the dollar that is mandated by ICE.

12 So I guess technically, I guess it is pulled
13 out of the Keefe Banking System. It has to be because
14 it is an Excel spreadsheet that has the detainees' A
15 number, their name, the date, the location of work, and
16 where it shows the \$1.00. So I have to restate that.
17 So yeah, apparently it does 'cause, now I'm thinking
18 about it, it has to come out there because of the manual
19 entries that we do. But -- sorry. Go ahead.

20 Q. Okay. How long have you had the Keefe Banking
21 system?

22 A. It's been longer there than I've been there.
23 I couldn't tell you the exact start of date of it. It's
24 been there beyond five years.

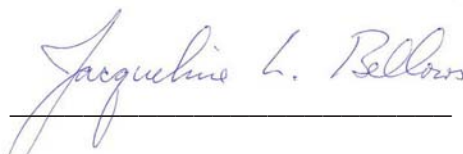
25 Q. Earlier you indicated that all of the records



REPORTER'S CERTIFICATE

I, JACQUELINE L. BELLOWS, the undersigned
Certified Court Reporter pursuant to RCW 5.28.010 authorized
to administer oaths and affirmations in and for the State of
Washington, do hereby certify that the sworn testimony
and/or proceedings, a transcript of which is attached, was
given before me at the time and place stated therein; that
any and/or all witness(es) were duly sworn to testify to the
truth; that the sworn testimony and/or proceedings were by
me stenographically recorded and transcribed under my
supervision, to the best of my ability; that the foregoing
transcript contains a full, true, and accurate record of all
the sworn testimony and/or proceedings given and occurring
at the time and place stated in the transcript; that a
review of which was requested; that I am in no way related
to any party to the matter, nor to any counsel, nor do I
have any financial interest in the event of the cause.

WITNESS MY HAND AND DIGITAL SIGNATURE this
27th day of July, 2018.



Jacqueline L. Bellows
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